

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
WESTERN DIVISION**

**WILBERT COOLEY AND
KANDEE COOLEY,**

Plaintiffs

v.
AMERIQUEST MORTGAGE
COMPANY, ET AL

Defendant.

CIVIL NO. 06-215

JOINT MOTION TO CONTINUE DISCOVERY

COMES NOW, the Plaintiffs, Wilbert and Kandee Cooley, and Defendants Ameriquest Mortgage and Heritage Title, and jointly moves this Honorable Court to continue the discovery scheduled to end on June 1st, 2007. As grounds the parties jointly offer the following:

1. Discovery for this case is scheduled to end on June 1st, 2007 and the parties desire to continue taking the depositions of certain persons beyond this date.
2. Specifically, the parties desire to take the depositions of Plaintiffs, HUD representatives, and corporate representatives from both Defendants.
3. Most of the interested persons or witnesses related to this lawsuit live out of state in California, Mississippi, and Georgia. Because of this, scheduling of depositions has been extremely difficult.

4. The parties need until July 31st, 2007 to complete the depositions needed in this matter and no party would be prejudiced by an extension. Each party is in agreement of the continuance as indicated by the signatures below.

WHEREFORE, each party respectfully prays that this Honorable Court will extend the discovery deadline until July 31st, 2007.

Respectfully submitted,

/s/April England-Albright
April England-Albright
Counsel for the Plaintiff

PLAINTIFF COUNSEL:

April England-Albright
Justice Group, Inc.
116 Mabry Street
Selma, Alabama 36701
(334) 872-7517 (Phone)
(866) 276-1131 (Fax)

/s/Robin Beardsley, Esq.
Kaye K. Houser, Esq.
Robin Beardsley, Esq.
Defendant, Ameriquest Mortgage

AMERIQUEST COUNSEL:

Kaye K. Houser, Esq.
Robin L. Beardsley, Esq.
SIROTE & PERMUTT, P.C.
2311 Highland Avenue South
Post Office Box 55727 (35255-5727)
Birmingham, AL 35205

/s/Laura Nettles, Esq.
Laura Nettles
Defendant Heritage Title

HERITAGE TITLE COUNSEL:

**Laura Nettles, Esquire
LLOYD, GRAY, & WHITEHEAD, P.C.
2501 Twentieth Place South, Suite 300
Birmingham, Alabama 35223**